

# SCHWARTZ, CONROY & HACK, PC

Making Insurance Companies Keep Their Promises

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November 22, 2022

**Via ECF**

Honorable Sanket J. Bulsara  
United States Magistrate Judge  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, New York 11201

SCHWARTZ,  
CONROY &  
HACK, PC

Making Insurance Companies  
Keep Their Promises

**Re: Government Employees Insurance Company et al., v. Zaitsev, et al.**  
**Docket No.: 20-cv-03495 (FB)(SJB)**

Dear Judge Bulsara:

This office represents Defendants, Alexandr Zaitsev, MD, Ridgewood Diagnostic Laboratory, LLC, Metropolitan Interventional Medical Services, PC, Drs. Negrea, Gorman, Ciccone and all of the Defendant NPs and PAs in connection with the above-referenced matter. Together with counsel for Plaintiffs, we jointly and respectfully write to request entry of a one-month extension of the expert discovery schedule.

In particular, the parties respectfully request that the Court amend the expert discovery deadlines as follows:

- Deadline to serve affirmative expert reports extended from November 30, 2022 to December 30, 2022;
- Deadline to serve rebuttal expert reports extended from December 30, 2022 to January 30, 2023; and
- Deadline to complete all discovery, including expert depositions, extended from January 31, 2023 to March 2, 2023.
- The date to take the first step in dispositive motion practice extended from March 2, 2023 to April 3, 2023.

This request is made jointly and for good cause. Defense counsel will be defending a criminal matter at trial in the Southern District of New York for 4-5 week beginning November 28, 2022. In addition, the requested extension accounts for the upcoming Thanksgiving holiday. Moreover, the case involves a large volume of documents and complex issues. Therefore, together with counsel for the Plaintiffs, Defendants respectfully request a

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30-day extension of the remaining deadlines so as to allow the parties to complete the expert discovery process and move this matter towards dispositive motion practice in early 2023.

I appreciate the Court's attention to this matter.

Very truly yours,

SCHWARTZ, CONROY & HACK, PC

By: /s/ Matthew J. Conroy  
Matthew J. Conroy

MJC/aja

cc: *All Counsel of Record via ECF*